

**U.S. Department of Justice**



*United States Attorney  
Southern District of New York*

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March 30, 2018

By ECF and Fax

The Honorable George B. Daniels  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Levine*, 14 Civ. 4057 (GBD); Request to maintain the current stay

Dear Judge Daniels:

We write respectfully on behalf of all parties in the above-referenced case. On February 14, 2018, the Court entered an Order staying this matter until March 31, 2018, so that the parties could continue their ongoing settlement negotiations. *See* Dkt. No. 29.

The parties have made significant progress towards a potential global settlement of this matter along with two separate cases captioned *Levine v. United States*, 13 Civ. 3094 (LTS)(GWG), and *CM Holdings III, LLC v. United States*, 13 Civ. 3095 (LTS)(GWG). Counsel for the parties met in person on February 22, 2018, to discuss certain reservations that Mr. Levine had regarding the United States' settlement proposal. Following that meeting, counsel spoke again by phone on March 12th and 29th.

As a result of the ongoing discussions described above, the parties believe that they have made significant progress towards reaching a settlement, although they must still resolve several outstanding issues. Accordingly, the parties respectfully request that the Court allow them until May 31, 2018, to continue their discussions. The parties further request that proceedings before this Court remain stayed until that time. We thank the Court for considering this submission.

Respectfully,

GEOFFREY S. BERMAN  
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